

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION**

Dr. Kenneth H. Mincey,	)	C/A No. 4:23-cv-01050-JD
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	<b>ANSWERS OF DEFENDANT</b>
Deere & Company and Southeast Farm	)	<b>SOUTHEAST FARM EQUIPMENT</b>
Equipment Company,	)	<b>COMPANY TO RULE 26.01</b>
	)	<b>INTERROGATORIES</b>
Defendants.	)	
	)	
	)	

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Pursuant to Local Civil Rule 26.01, DSC, Defendant Southeast Farm Equipment Company (“Southeast”) submits the following answers to Interrogatories 26.01 (A)-(G):

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

**ANSWER:**

Southeast is unaware of any persons or legal entities that may have a subrogation interest.

(B) As to each claim, state whether it should be tried by jury or non-jury and why.

**ANSWER:**

Plaintiff demands a jury trial in his Amended Complaint, and Southeast joins in that demand.

(C) State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party’s stock; (2) each publicly owned company of which it is a

parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

**ANSWER:**

Southeast is not a publicly-owned company, and subparagraphs (1) – (3) of this Interrogatory are inapplicable.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**ANSWER:**

Plaintiff filed this case in the South Carolina Court of Common Pleas for the Twelfth Judicial Circuit in Marion County, which is located in this Division. Defendant Deere & Company removed this case to the Florence Division, and Southeast joins in and consents to the Notice of Removal.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action.

**ANSWER:**

Southeast is not aware of any related matters filed in this District.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**ANSWER:**

Southeast is properly identified.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

**ANSWER:**

Southeast denies all allegations of liability asserted against it in Plaintiff's Amended Complaint. Responding further, if and to the extent the allegations set forth in Plaintiff's Amended Complaint are proven true, Defendant Deere may be liable in whole or in part to Plaintiff in relation to the design, manufacture, sale and/or subsequent corrective actions it recommended or failed to recommend with regard to the subject tractor. Southeast reserves its right to pursue discovery and to amend or supplement this Answer if warranted by its investigation in the facts and circumstances of this action.

(Signature page to follow.)

TURNER, PADGET, GRAHAM & LANEY, P.A.

March 28, 2023

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ATTORNEYS FOR DEFENDANT  
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